

WILLIAM W. MANLOVE, Oregon State Bar ID Number 891607  
Senior Deputy City Attorney  
Email: william.manlove@portlandoregon.gov  
Office of City Attorney  
1221 SW 4th Avenue, Rm 430  
Portland, OR 97204  
Telephone: (503) 823-4047  
Facsimile: (503) 823-3089  
Of Attorneys for Defendant

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORTLAND DIVISION**

**THOMAS GLENN and PATSY  
McKINNEY,**

**11-CV-402-KI**

**PLAINTIFFS,**

**v.**

**CITY OF PORTLAND, a public body,**

**DEFENDANT.**

**AFFIDAVIT OF CHERYL NOLL (IN  
SUPPORT OF DEFENDANT'S  
RESPONSE TO MEMORANDUM OF  
LAW IN SUPPORT OF PLAINTIFFS'  
MOTION FOR PARTIAL SUMMARY  
JUDGMENT)**

STATE OF OREGON            )  
  ) ss.  
County of Multnomah        )

I, CHERYL NOLL, being first duly sworn, depose and say:

1. I am a Paralegal Supervisor currently assigned to assist Senior Deputy City Attorney William Manlove on this lawsuit.

2. Attached to my affidavit as **Exhibit 1** is a CD containing Bureau of Emergency Communication ("BOEC") audio recordings relate to the incident that is the subject of this litigation. Track 1 is a recording of the 9-1-1 call placed by a caller identified as "Raya." Track

2 is the recording of the radio communications between the 9-1-1 dispatchers and police officers.

3. I have listened to the BOEC audio recording of the 9-1-1 call placed by a caller identified as "Raya." Attached as **Exhibit 2** is a true copy of the transcript of that call. This transcript is an accurate reflection of the audio recording.

4. I have also listened to the BOEC audio recording of the radio communications between 9-1-1 dispatchers and police officers. Attached as **Exhibit 3** is a true copy of the transcript of those communications. The communications in small italicized print are not related to the call that is the subject of this litigation. This transcript is an accurate reflection of the audio recording.

/s/ Cheryl Noll  
Cheryl Noll

SUBSCRIBED AND SWORN TO before me this 13<sup>th</sup> day of January, 2012, by Cheryl Noll.

Delphine Kennedy-Walker  
Notary Public for Oregon  
My commission expires: 9/21/15